



Decision _____

FILED

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of San Diego Gas and Electric Company (U 902 E) for Authority to Implement Optional Pilot Program To Increase Access To Solar Generated Electricity	Application 12-01-008 (Filed January 17, 2012)
In the Matter of the Application of Pacific Gas and Electric Company (U 39 E) to Establish a Green Option Tariff	Application 12-04-020 (Filed April 24, 2012)
In the Matter of the Application of Southern California Edison Company (U 338-E) for Approval of Optional Green Rate	Application 14-01-007 (Filed January 10, 2014)

**INTERVENOR COMPENSATION CLAIM
OF THE UTILITY REFORM NETWORK
AND DECISION ON INTERVENOR COMPENSATION CLAIM
OF THE UTILITY REFORM NETWORK**

Intervenor: The Utility Reform Network	For contribution to Decisions (D.) 15-01-051, 16-05-006
Claimed: \$213,614.54	Awarded: \$
Assigned Commissioner: Michael Picker	Assigned ALJ: Michelle Cooke, Regina DeAngelis
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/
Date: 7/18/2016	Printed Name: Matthew Freedman

PART I: PROCEDURAL ISSUES (to be completed by Intervenor except where indicated)

A. Brief description of Decision:	<u>Decision 15-01-051</u> This decision begins the implementation of Senate Bill (SB) 43 and the formal requirement for the three large electrical utilities to implement the Green Tariff Shared Renewables (GTSR) Program. The decision adopts requirements for the first three phases of the proceeding relating to indifference between participating and non-
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	<p>participating ratepayers, approves modified GTSR programs for each of the three utilities, and establishes minimum advance procurement goals.</p> <p><u>Decision 16-05-006</u> The decision refines the GTSR program adopted in D.15-01-051 to modify the size of eligible Enhanced Community Renewables (ECR) projects, to direct the three utilities to hold two Renewable Auction Mechanism solicitations a year for ECR projects, to adopt a forecasting methodology for a 20-year estimate of bill credits and charges, and to resolve all remaining issues in Phase IV of the proceeding.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	June 27, 2012	
2. Other specified date for NOI:	See Comment #1	
3. Date NOI filed:	July 24, 2012	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	A.12-01-008	
6. Date of ALJ ruling:	December 5, 2012	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	A.12-01-008	
10. Date of ALJ ruling:	December 5, 2012	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-05-006	
14. Date of issuance of Final Order or Decision:	May 19, 2016	
15. File date of compensation request:	July 18, 2016	
16. Was the request for compensation timely?		

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor's Comment(s)	CPUC Discussion
1	TURN	<p>TURN filed NOIs in each of the three proceedings that were ultimately consolidated. TURN's first NOI was filed on July 24, 2012 in A.12-04-020 (PHC held on June 27, 2012). TURN's second NOI was filed on October 15, 2012 in A.12-01-008 (PHC held on October 5, 2012). TURN's third NOI was filed on April 4, 2014 in A.14-01-007 (PHC held on March 10, 2014).</p> <p>A.12-01-008 and A.12-04-020 were consolidated pursuant to an Assigned Commissioner's Ruling issued on July 31, 2013. These two proceedings were additionally consolidated with A.14-01-007 pursuant to a ruling of Administrative Law Judge Richard Clark issued on April 1, 2014.</p> <p>The Commission issued a ruling in A.12-01-008 on December 5, 2012 finding TURN eligible to claim compensation and making a showing of significant financial hardship. The Commission did not issue a formal ruling on TURN's NOIs in the other two proceedings.</p>

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. PG&E / SETTLEMENT</p> <p>TURN opposed PG&E's original application that would have relied entirely on short-term purchases of tradable Renewable Energy Credits (RECs) to provide a voluntary renewable energy product to its customers. TURN prepared testimony opposing PG&E's proposed approach and outlining an alternative involving the purchase of bundled renewable energy from new facilities under long-term</p>	<p><u>Testimony of John Sugar on behalf of TURN on PG&E's Green Option Program, A.12-04-020, October 18, 2012</u></p> <p><u>Joint Motion of PG&E, TURN, CCUE, the Black Economic Council, NAAC, Latino Business Chamber of Greater Los Angeles, Sierra Club California, and California Clean Energy Committee to Adopt Settlement, A.12-04-020, April 11, 2013</u></p> <p><u>Rebuttal testimony of Matthew Freedman</u></p>	

<p>contracts with subscribers charged a unique generation rate based on the actual procurement cost from these facilities. TURN proposed that subscribers would pay program administrative costs and other costs needed to ensure ratepayer indifference. TURN also proposed that PG&E apply for the retirement of carbon allowances associated with these voluntary sales under the Air Resources Board Voluntary Renewable Energy Program.</p> <p>TURN entered into settlement negotiations with PG&E and a number of other parties and actively negotiated to reach an agreement. In April of 2013, TURN joined a coalition of parties submitted a settlement proposal under which PG&E would abandon its original proposal and pursue a program that included virtually every element outlined in the alternative approach described in TURN's testimony. The settlement was ultimately treated as the proposed PG&E GTSR program for evaluation and adoption by the Commission and practically all elements of the proposal were adopted in the final decision including the basic structure of procuring bundled renewable energy projects, offering a fixed rate to subscribers, the collection of indifference charges, the creation of an external advisory group, a cooling off period for customers, a shareholder backstop for administrative and marketing costs not recovered from subscribers, a renewable integration charge, a solar value adjustment, reporting requirements and participation in the CARB Voluntary Renewable Energy Program. All of these</p>	<p><u>on the Green Tariff Shared Renewables Program Applications of PG&E and SDG&E, A.12-04-020/A.12-01-008, January 21, 2014, pages 1-2.</u></p> <p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, A.12-04-020/A.12-01-008, March 21, 2014, pages 1-3.</u></p> <p><u>D.15-01-051, pages 12-13, 19, 25, 50, 51, 84, 87, 93, 111, 119, 121</u></p>	
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provisions of the settlement were adopted in the final Decision.		
<p>2. PROCUREMENT / ADVANCE PROCUREMENT</p> <p>TURN urged the Commission to direct all three IOUs to engage in advance procurement of resources to serve GTSR subscribers. TURN explained that the absence of advance procurement would mean that actual renewable resource development to serve GTSR customers would significantly lag subscriber demand. TURN also pointed to the significant benefits of the federal investment tax credit that was expected to be available only for projects coming online by the end of 2016. TURN further recommended that advance procurement be conducted as part of the RAM 6 solicitation for each IOU.</p> <p>The Decision orders each utility to engage in specific amounts of advance procurement to address the multi-year timeline for development new renewable generation and to ensure that sufficient capacity is procured to meet demand in a timely fashion rather than “perpetually lagging behind demand.” The Decision agrees with TURN that “additionality” is critical for the success of the program and notes that capacity brought online by the end of 2016 would be eligible for the Investment Tax Credit. The Decision orders advance procurement to occur in the RAM 6 auction as proposed by TURN. Each of the rationales provided for ordering advance procurement is consistent with the arguments made by TURN in testimony and briefs.</p>	<p><u>Rebuttal testimony of Matthew Freedman on the Green Tariff Shared Renewables Program Applications of PG&E and SDG&E, January 21, 2014, pages 2-6.</u></p> <p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, pages 18-21</u></p> <p><u>Direct Testimony of Matthew Freedman on the Green Rate Application of SCE, April 11, 2014, pages 6-7</u></p> <p><u>Opening brief of TURN on the Application of SCE for approval of a Green Tariff Shared Renewables Program, May 2, 2014, pages 13-15</u></p> <p><u>Opening brief of TURN Addressing Renewable Procurement and Cost Issues Raised by Decision 14-11-042, December 18, 2014, pages 3-5.</u></p> <p><u>D.15-01-051, pages 25-28, 32-33</u></p>	

<p>3. PROCUREMENT / BID SELECTION CRITERIA</p> <p>TURN opposed SDG&E's proposal to limit its selection to bids not more than \$4/MWh above the weighted average price for all other solar bids shortlisted in the RAM solicitation. TURN urged the use of a reasonableness standard for determining whether GTSR bid pricing is acceptable.</p> <p>The Decision agrees with TURN's recommendation to reject SDG&E's approach and instead allow IOUs to use "reasonableness" as the standard for determining the cost-effectiveness of a bid for new resources to serve GTSR customers received in a solicitation.</p>	<p><u>Rebuttal testimony of Matthew Freedman on the Green Tariff Shared Renewables Program Applications of PG&E and SDG&E, January 21, 2014, pages 12-15.</u></p> <p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, pages 21-23.</u></p> <p><u>D.15-01-051, pages 37-38</u></p>	
<p>4. PROCUREMENT / PORTFOLIO COMPOSITION</p> <p>TURN supported the use of existing renewable energy resources already in IOU portfolios to serve initial GTSR subscribers and argued this approach would benefit non-participating customers. In response to concerns raised by Marin Clean Energy regarding the need for clear cost allocation and ratepayer indifference, TURN suggested that the IOUs be required to identify which existing resources are allocated to the GTSR portfolios.</p> <p>The Decision agrees with TURN about the use of existing resources and approves the IOU proposals to rely on specific projects in their portfolios to initially serve GTSR subscribers.</p>	<p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, pages 9-10</u></p> <p><u>Reply brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, April 9, 2014, pages 11-12</u></p> <p><u>D.15-01-051, pages 42-43, Conclusion of Law 10.</u></p>	
<p>5. PROCUREMENT / RPS BACKSTOP</p>		

<p>TURN argued that SB 43 requires any unsubscribed energy associated with new renewable procurement on behalf of GTSR customers to be allocated to the non-participant ratepayer energy portfolio and applied to Renewables Portfolio Standard requirements. TURN outlined the difficulty of assessing the exact impacts of this backstop on non-participants and pointed out that no party criticizing the backstop has offered a workable method for calculating the net rate impacts.</p> <p>The Decision agrees that SB 43 requires utilities to use the RPS backstop method for any overprocurement on behalf of GTSR subscribers. The Decision further agrees with TURN that the determination of net impacts on non-participants is difficult and that no party has identified a “reasonable, practicable, definitive method for determining a price difference.”</p>	<p><u>Rebuttal testimony of Matthew Freedman on the Green Tariff Shared Renewables Program Applications of PG&E and SDG&E, January 21, 2014, pages 6-11.</u></p> <p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, pages 16-18</u></p> <p><u>Reply brief of TURN on the Application of SCE for approval of a Green Tariff Shared Renewables Program, May 9, 2014, pages 3-4</u></p> <p><u>D.15-01-051, pages 47-50.</u></p>	
<p>6. PROCUREMENT / SCE PROPOSAL FAILS TO SATISFY ADDITIONALITY</p> <p>TURN urged the Commission to reject SCE’s procurement and portfolio proposal as unreasonable and inconsistent with SB 43. TURN argued that the proposal fails the additionality test and would not produce any incremental renewable power to serve subscribers. TURN urged the Commission to require dedicated procurement comparable to the approaches proposed by PG&E and SDG&E.</p> <p>The Decision agrees with TURN and finds that SCE’s proposal “fails to meet the additionality requirements of SB 43”. The Decision requires SCE to</p>	<p><u>Direct Testimony of Matthew Freedman on the Green Rate Application of SCE, April 11, 2014, pages 2-6, 8-11</u></p> <p><u>Opening brief of TURN on the Application of SCE for approval of a Green Tariff Shared Renewables Program, May 2, 2014, pages 3-16</u></p> <p><u>D.15-01-051, pages 25-26</u></p>	

<p>restructure its GTSR program to promote additional resources consistent with the approaches approved for SDG&E and PG&E.</p>		
<p>7. ENHANCED COMMUNITY RENEWABLES / CITY OF DAVIS</p> <p>TURN argued that SB 43 does not authorize the City of Davis to administer its own GTSR program and does not allow for the bill crediting arrangement proposed by the City.</p> <p>The Decision agrees that SB 43 did not intend to create a separate program managed by the City of Davis and rejects the proposal to apply a different rate structure to apply to projects eligible for the City of Davis reservation.</p>	<p><u>Opening brief of TURN on the Enhanced Community Renewables Proposal of PG&E, May 5, 2014, pages 7-8</u></p> <p><u>Reply brief of TURN on the Enhanced Community Renewables Proposal of PG&E, May 9, 2014, pages 2-4</u></p> <p><u>D.15-01-051, pages 74-78.</u></p>	
<p>8. ENHANCED COMMUNITY RENEWABLES / PG&E PROPOSAL</p> <p>TURN express concerns about PG&E's proposed Enhanced Community Renewables program, noting that there is a weak linkage between customer interest and subscription and particular local projects. TURN urged the Commission to provide more time for PG&E to develop the specifics for viable program. TURN also urged the Commission to allow the structure to evolve over time and to consider modifications through an advice letter or petition to modify the final decision.</p> <p>The Decision agrees with TURN that PG&E's proposal does not provide for a direct project-customer link and fails to provide an adequate role for local communities. The Decision also agrees with TURN that more specifics are necessary in order to approve a program for PG&E</p>	<p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, pages 26-28.</u></p> <p><u>Opening brief of TURN on the Enhanced Community Renewables Proposal of PG&E, May 5, 2014, pages 1-5</u></p> <p><u>Reply brief of TURN on the Enhanced Community Renewables Proposal of PG&E, May 9, 2014, page 1</u></p> <p><u>D.15-01-051, pages 60-61</u></p>	

<p>customers. The Decision directs PG&E to submit additional details in a subsequent advice letter filing.</p>		
<p>9. ENHANCED COMMUNITY RENEWABLES / BILL PRESENTMENT</p> <p>In comments on the Proposed Decision, TURN expressed concern about the proposal to include an identical charge and credit on the bill of ECR subscribers, noting that this mechanism is likely to confuse customers. TURN urged the Commission to ensure that the bill presentment does not mislead or confuse customers.</p> <p>The Decision agreed with TURN's concern and included a table from TURN's comments, noting "TURN's illustrative example is useful in understanding the charges and credits applicable to the customer under the ECR basic transaction structure approved in this decision, and we include it for reference." The Decision states "we agree with TURN that bill presentment should not be confusing" and directs the IOUs to develop a bill format that clarifies the treatment of these charges and credits.</p>	<p><u>Opening comments of TURN on the Proposed Decision of ALJ McKinney, January 20, 2015, pages 1-3.</u></p> <p><u>D.15-01-051, pages 65-67</u></p>	
<p>10. PROGRAM DESIGN / DURATION</p> <p>TURN argued that although the statutory provisions enacted in SB 43 sunset on January 1, 2019, the Commission has sufficient general authority to allow the GTSR programs to continue past that date. TURN pointed out that the Commission has historically exercised its general authority to approve voluntary utility program offerings without any specific</p>	<p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, pages 5-6</u></p> <p><u>Reply brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, April 9, 2014, pages 3-5</u></p>	

<p>statutory authorization. TURN urged the Commission to reject ORA's proposal that new applications be filed to extend the programs and instead allow any utility to extend its existing program, and allow new enrollments after 2019, through the filing of a Tier 3 Advice Letter.</p> <p>The Decision affirms TURN's view that nothing in SB 43 prohibits the Commission from continuing to authorize voluntary programs and, as pointed out by TURN, notes that such programs have previously been approved without any specific statutory authorization. The Decision agrees with TURN and rejects ORA's proposal for new applications to be filed in 2018. The Decision also adopts TURN's recommendation to allow the use of a Tier 3 Advice Letter to extend or terminate the programs after 2019.</p>	<p><u>D.15-01-051, pages 81-82.</u></p>	
<p>11. PROGRAM DESIGN / ADMINISTRATIVE AND MARKETING COSTS</p> <p>TURN supported the proposal included in the partial settlement for any program administration and marketing costs not recovered from GTSR subscribers to be allocated to PG&E shareholders for the first five years of the program.</p> <p>The Decision agrees with TURN that a shareholder backstop is reasonable and will promote cost-effective management of the GTSR program.</p>	<p><u>Rebuttal testimony of Matthew Freedman on the Green Tariff Shared Renewables Program Applications of PG&E and SDG&E, January 21, 2014, pages 19-21.</u></p> <p><u>Opening brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, page 11</u></p> <p><u>D.15-01-051, page 112.</u></p>	
<p>12. RATE DESIGN / INDIFFERENCE CHARGES</p> <p>TURN urged the Commission to approve the application of the Power Charge Indifference</p>	<p><u>Opening brief of TURN on the Applications</u></p>	

<p>Adjustment (PCIA) to GTSR subscribers as a method of ensuring non-participant indifference. TURN expressed concern about creating new methodologies that lack record support and could have significant implications in a wide range of proceedings.</p> <p>The Decision agrees with TURN that the PCIA is an appropriate proxy for basing the GTSR customer indifference amount. In support of this outcome, the Decision cites TURN's argument that the PCIA is an established charge, does not require new analysis, and avoids the need to develop new approaches to customer indifference that could have far-reaching implications.</p>	<p><u>of PG&E and SDG&E for approval of a green tariff shared renewables program, March 21, 2014, page 11</u></p> <p><u>D.15-01-051, pages 102-103</u></p>	
<p>13. RATE DESIGN / RENEWABLE INTEGRATION CHARGE</p> <p>TURN urged the Commission to limit the application of a Renewable Integration Charge (RIC) to energy provided from new resources procured to serve GTSR subscriber demands. TURN pointed out that the RIC adopted in D.14-11-042 can only be calculated for new contracts and does not apply to existing resources.</p> <p>The Decision agrees that, because the RIC adder in D.14-11-042 is being applied prospectively, the RIC "should only apply to incremental GTSR projects". The Decision declines to apply a RIC to existing resources in the utility portfolios unless a different mechanism is developed in another proceeding.</p>	<p><u>Opening brief of TURN addressing Renewable Procurement and Cost Issues Raised by Decision 14-11-042, December 18, 2014, pages 1-3.</u></p> <p><u>D.15-01-051, pages 118-119.</u></p>	
<p>14. RATE DESIGN / SOLAR VALUE ADJUSTMENT</p> <p>TURN argued that the Solar</p>	<p><u>Direct Testimony of Matthew Freedman on</u></p>	

<p>Value Adjustment (SVA) methodology proposed by SCE was inconsistent with the requirements of SB 43 and contrary to the approach taken by PG&E and SDG&E. TURN explained that SCE's approach does not consider the delivery profile of actual resources serving customers or the time of delivery profile of the customer class. TURN urged the Commission to direct SCE to adopt the same approach proposed by PG&E.</p> <p>The Decision agrees with TURN that SCE's SVA value would not be based on the profile for the Green Tariff pool of resources and therefore does not meet the requirements of SB 43. The Decision orders SCE to conform to the approach used by PG&E and SDG&E and to ensure that the SVA reflects the differences between the time of delivery profile of the generating resource and the customer class.</p>	<p><u>the Green Rate Application of SCE, April 11, 2014, pages 12-14</u></p> <p><u>Opening brief of TURN on the Application of SCE for approval of a Green Tariff Shared Renewables Program, May 2, 2014, pages 19-23</u></p> <p><u>D.15-01-051, pages 123-124.</u></p>	
<p>15. RATE DESIGN / IREC PROPOSAL</p> <p>TURN opposed two alternative rate design proposals submitted by the Interstate Renewable Energy Council (IREC) as premature and inconsistent with the requirements of SB 43. TURN pointed out that IREC's proposal would not provide a customer hedge against rising fuel prices and that the cost benefit analysis relied upon is inappropriate and would not preserve ratepayer indifference.</p> <p>The Decision rejects the IREC alternatives noting that they are not consistent with the specific requirements of SB 43 to use the class average generation rate coupled with other specified rate charges and credits. The Decision</p>	<p><u>Reply brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, April 9, 2014, pages 5-9</u></p> <p><u>Reply brief of TURN on the Application of SCE for approval of a Green Tariff Shared Renewables Program, May 9, 2014, pages 4-9</u></p> <p><u>D.15-01-051, pages 127-129.</u></p>	

<p>also agrees with TURN that IREC's proposed cost-benefit analysis would not ensure ratepayer indifference and that promised benefits to customers would not materialize.</p>		
<p>16. COMPETITIVE IMPACTS</p> <p>TURN urged the Commission to reject arguments by Shell Energy that the Green Tariff program proposals represent a form of new direct access prohibited by law. TURN argued that the GTSR program is expressly authorized by SB 43 and that offering a green tariff does not transform a utility into a direct access provider. TURN also urged the Commission to reject Shell's proposal to allow direct access providers to offer renewable energy directly to bundled utility customers as a substitute for the utility tariff offerings.</p> <p>The Decision rejects the arguments raised by Shell. Citing TURN's brief, the Decision agrees that a customer opting to subscribe to a green tariff option is not comparable to the customer opting to receive service from a third party direct access provider. The Decision cites TURN's arguments to support the conclusions that the green tariff program does not violate the prohibitions on new direct access, is expressly authorized by statute, and does not transform the utility into a direct access provider. The Decision also declines to adopt an alternative approach proposed by Shell that relies upon direct access providers.</p>	<p><u>Reply brief of TURN on the Applications of PG&E and SDG&E for approval of a green tariff shared renewables program, April 9, 2014, pages 26-29</u></p> <p><u>Reply brief of TURN on the Application of SCE for approval of a Green Tariff Shared Renewables Program, May 9, 2014, pages 13-14.</u></p> <p><u>D.15-01-051, pages 24, 146-148</u></p>	
<p>17. PHASE IV / ECR PROCUREMENT</p> <p>TURN urged the use of the Renewable Auction Mechanism</p>	<p><u>Reply comments of TURN on the Phase IV</u></p>	

<p>for the procurement from Green Tariff and Enhanced Community Renewables projects and to allow projects up to 20 MW in size to become eligible for participation.</p> <p>The Decision agreed to modify the program requirements and eliminate sole reliance on the ReMAT for procurement of Enhanced Community Renewables projects and to allow projects up to 20 MW in size to participate.</p>	<p><u>Track B Issues, December 9, 2015, page 5</u></p> <p><u>Reply comments of TURN on SB 793 and The Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool, December 11, 2015, pages 1-2.</u></p> <p><u>Decision 16-05-006, pages 8-10, 12, Conclusion of Law 3</u></p>	
<p>18. PHASE IV / SB 793</p> <p>TURN argued that the provisions of SB 793 (Wolk) do not require the utilities to offer fixed rate subscriptions for durations of up to 20 years and that the current program already allows customers to participate for up to 20 years subject to the variable rate components. TURN also argued for the nonbinding forecast of bill credits and charges to rely upon a five year rolling average applied to the generation rate component and to apply a uniform escalator to the most recently adopted rate components that cannot be forecasted. TURN further proposed that the forecasts be presented with “easy-to-understand caveats” so customers recognize that they are not guaranteed or binding.</p> <p>The Decision rejects proposal to allow subscribers to lock in fixed rates over any period but notes the ability of these customers to remain in the program for a period of up to 20 years. The Decision also adopts TURN’s proposal to use a five-year rolling average for the generation rate and to apply a uniform escalator (CPI-W) to a number of other</p>	<p><u>Reply comments of TURN on SB 793 and The Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool, December 11, 2015, pages 5-6.</u></p> <p><u>Opening comments of TURN on SB 793 and The Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool, November 20, 2015, pages 1-4.</u></p> <p><u>D.16-05-006, pages 21-22, 26-28, Conclusion of Law 15</u></p>	

<p>charges and credits. Finally, the Decision agrees that the presentation of these forecast must be clear that they are easy to understand and “non-binding”.</p>		
<p>19. PHASE IV/GHG DISCLOSURE</p> <p>TURN argued that there is no uniform methodology adopted by any state agency for calculating the Greenhouse Gas (GHG) emissions rate associated with retail electricity products and urged the Commission to prohibit retail sellers from making GHG claims relating to retail electricity products. TURN further noted that the Commission should not adopt a uniform approach since Legislature is considering the adoption of AB 1110 that establish parameters for disclosure. Finally, TURN noted that this prohibition is consistent with prior direction provided by the CPUC Executive Director prohibiting the inclusion of GHG data on any joint mailings by PG&E and Community Choice Aggregators.</p> <p>The Decision agrees that there is no relevant statewide methodology to calculate a GHG emissions rate, that it would be preferable to wait until such a methodology is established either through new legislation or by the California Energy Commission, and that the GTSR program may not be marketed by making claims about GHG emissions consistent with the prior direction provided by the CPUC Executive Director to Marin Clean Energy, Sonoma Clean Power and PG&E.</p>	<p><u>Opening comments of TURN on Phase IV Track B Issues, November 9, 2015, pages 6-8.</u></p> <p><u>Reply comments of TURN on the Phase IV Track B Issues, December 9, 2015, pages 1-3.</u></p> <p><u>D.16-05-006, pages 30-32.</u></p>	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: Sierra Club California, California Clean Energy Committee, Black Economic Council, National Asian American Coalition, Latino Business Chamber of Greater Los Angeles		
d. Intervenor's claim of non-duplication: TURN provided a variety of unique positions in this proceeding that were not shared with most other parties. Specifically, TURN supported specific procurement, rate design and program structure proposals that were different from those offered by an array of other intervenors. TURN engaged in detailed analysis of these proposals, offered extensive policy, legal and factual arguments, and covered a far wider range of issues than any other intervenor. Most other parties and intervenors did not support TURN's positions and TURN actively opposed a number of proposals made by other parties. TURN and ORA were not aligned on most issues, with TURN actively litigating against ORA's positions with respect to program design, procurement rules, and rate credits. TURN also opposed a variety of positions taken by solar industry interests such as the Interstate Renewable Energy Council, the Solar Energy Industries Association, and Vote Solar. Due to an alignment of positions between TURN and several other intervenors, these parties worked together to reach a partial settlement relating to PG&E's program that was submitted in early 2013. By engaging in settlement negotiations, TURN was able to limit duplication and attempt to resolve a number of issues before the submission of testimony and briefs. The settling parties continued to coordinate throughout the remainder of the proceeding. Given that TURN offered a unique perspective not shared by any other intervenor, and coordinated extensively with intervenors who shared TURN's positions, the Commission should conclude that no reductions in compensation are warranted based on duplication of effort.		

C. Additional Comments on Part II (use line reference # or letter as appropriate):

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

#	Intervenor's Comment	CPUC Discussion
1	TURN devoted a small number of hours to evaluating implementation advice letters, attending workshops, and reviewing materials from the external advisory groups established by D.15-01-051. The Commission authorized work on these activities to be eligible for intervenor compensation in D.15-01-051 (pages 88-89). TURN performed the minimum activity required to be able to ensure that the implementation of the many requirements in D.15-01-051 was consistent with the requirements established in the Decision. Given the small number of hours involved, and the important of encouraging participation in post-decision implementation by intervenors who were active in the other portions of the proceeding, TURN requests that the Commission find such hours to be reasonable and compensable as part of this request.	

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

<p>TURN's participation assisted the Commission in assessing the reasonableness of the SB 43 program structure for SCE, PG&E, and SDG&E. The results of TURN's participation can be found in almost every element of the program design adopted by the Commission. The breadth of TURN's substantial contributions demonstrate the benefits of its participation in this proceeding.</p> <p>Specifically, TURN's early participation resulted in PG&E abandoning its primary proposal in favor of a settlement based on the structure outlined in TURN's testimony. That settlement became PG&E's proposal that was adopted, with modifications, by the Commission. Under the settlement, PG&E committed to procuring renewable energy from new, local projects under long-term contracts and charging subscribers based on the actual cost of the energy from these facilities.</p> <p>As a result of TURN's litigation efforts, the Commission rejected SCE's proposal to rely exclusively on existing portfolio resources to serve Green Tariff subscribers. TURN was the only party to actively oppose core elements of SCE's proposed program. TURN successfully persuaded the Commission to require SCE to engage in incremental procurement of new solar resources on behalf of Green Tariff subscribers.</p>	<p>CPUC Discussion</p>
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<p>TURN's focus on the importance of advance procurement led the Commission to direct the three utilities to procure at least 110 MW from new local solar facilities at the outset of the program. TURN was the primary party arguing for aggressive advanced procurement. These facilities, once online, will allow these utilities to offer incremental renewable generation to subscribers at attractive prices that reflect current market conditions.</p> <p>TURN's work on program rate design assisted the Commission in approving approaches ensuring that both subscribers and non-participants are treated fairly and that ratepayer indifference is preserved. TURN's contributions also ensured that subscribers receive a meaningful hedge against changes in utility rates over time, thereby providing price stability benefits tied to the fixed pricing for renewable resources.</p> <p>Taken together, the benefits obtained by TURN far exceed the cost of TURN's participation in these three consolidated proceedings. TURN's claim should be found to be reasonable.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>Given the comprehensive showing made by TURN in this proceeding, and efficiency of its work on a large set of complex issues, the amount of time devoted by its staff and consultants is fully reasonable.</p> <p>TURN retained the services of JBS Energy to assist with initial testimony in response to the PG&E application. John Sugar assisted TURN with research and discovery and drafted prepared testimony outlining flaws with PG&E's proposal and outlining an alternative approach.</p> <p>Matthew Freedman was the lead attorney for TURN in this proceeding. Mr. Freedman drafted all pleadings and participated in two sets of evidentiary hearings. Due to his expertise on many of the core issues, Mr. Freedman also served as an expert witness and sponsored prepared testimony in two separate phases of the proceeding. By having Mr. Freedman serve as both an attorney and a witness, TURN was able to achieve significant efficiencies and enhanced productivity that reduced the total number of hours required for participation in the proceeding.</p> <p>Mr. Freedman was assisted by several other TURN attorneys over the course of the proceeding. Nina Suetake served as the lead attorney for TURN in late 2012 during a period when Mr. Freedman was on extended leave. Marcel Hawiger provided limited assistance with the review of Mr. Freedman's prepared testimony. Hayley Goodson attended evidentiary hearings and served as Mr. Freedman's attorney when he was subjected to cross-examination. Finally, TURN energy analyst Eric Borden represented TURN at a prehearing conference when no attorney was available due to scheduling and workload issues.</p> <p><u>Compensation Request</u></p> <p>TURN's request also includes 17.75 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable.</p>	

c. Allocation of hours by issue:

TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.

GP – 56 hours – 10% of total

General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses. This includes reviewing the initial applications and Commission rulings, initial review of utility filings and motions, reviewing responses to data requests submitted by other parties, reviewing pleadings submitted by other parties, review of reviewing rulings by the Commission, and review of the proposed decision. Also includes work coordinating with other parties.

EH – 90 hours – 16% of total

Work relating to attendance at Prehearing conferences, workshops, and evidentiary hearings held at the Commission. Also includes time spent preparing for these events, transcript review, and other activities directly related to attendance and participation.

PG&E / SETT – 115 hours – 21% of total

Work relating the negotiation of a settlement with PG&E over its original application. Includes time spent negotiating the settlement, defending the settlement, promoting adoption of the settlement, and working on joint pleadings with the settling parties.

PROCURE – 121 hours – 22% of total

Work relating to the procurement framework for the GTSR programs of all three utilities. Includes advance procurement, use of unbundled RECs, bid selection criteria, use of existing RPS resources, the applicability of an RPS backstop, and SCE's proposal to rely entirely on existing portfolio resources to serve subscribers.

ECR – 39 hours – 7% of total

Work relating to the Enhanced Community Renewables proposals of all three utilities and the proposal by the City of Davis to administer its own program.

PROGDES – 33.15 hours – 6% of total

Work relating to the design of the GTSR program including customer subscription rules, the duration of the overall programs, PG&E's proposed shareholder backstop for M&A costs, and other criteria for participation.

RATE – 55 hours – 10% of total

Work relating to the design of retail rates for GTSR program subscribers. Includes the applicability of indifference charges, the Renewable Integration Charge, the calculation of the solar value adjustment, and the proposal by IREC to substitute an alternative rate credit approach.

COMP IMPACTS – 16 hours – 3% of total

<p>Work relating to the competitive impacts of the SB 43 programs including the relationship to direct access, the relevance of affiliate transaction rules, and whether electric service providers should be permitted to participate.</p> <p>PHASE IV – 26.25 hours – 5% of total Work relating to all issues resolved in Phase IV of this proceeding including requirements for ECR procurement, the applicability of SB 793, and Greenhouse Gas disclosure rules.</p> <p>IMP – 5.5 hours – 1% of total Work relating to implementation of D.15-01-051 including the review of advice letter filings, presentations provided to external advisory groups, and other activities necessary to ensure compliance with specific Commission direction to the utilities.</p> <p>COMP – 17.75 hours Work preparing TURN's three notices of intent to claim compensation and the final request for compensation.</p> <p>Hours that were multi-issue in nature were coded as follows:</p> <p># -- allocated 40% PROCURE / 25% RATE DESIGN / 20% PROGDES / 10% COMP IMPACTS / 5% ECR</p> <p>% -- allocated 60% PROCURE / 30% RATE DESIGN / 10% ECR</p> <p>TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.</p>	
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B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matthew Freedman	2012	39.25	375	D.15-05-019; D.15-10-015; D.15-11-040	14,718.75			
Matthew Freedman	2013	169	400	D.14-11-019	67,600.00			
Matthew Freedman	2014	210.75	410	D.15-06-021; D.15-08-023	86,407.50			
Matthew Freedman	2015	44.5	410	D.15-11-040; D.15-12-043	18,245.00			

Matthew Freedman	2016	8.75	415	D.16-06-024	3,631.25			
Hayley Goodson	2014	3	355	D.15-07-034; D.15-07-034; D.15-07-028	1,065.00			
Eric Borden	2015	4.25	180	D.16-05-015	765.00			
Nina Suetake	2012	15.25	315	D.15-01-016; D.15-07-027; D.15-08-016	4,803.75			
Marcel Hawiger	2014	0.5	410	D.15-06-021; D.15-08-023	205.00			
John Sugar	2012	57.47	205	D.14-12-073; D.15-08-023	11,781.35			
John Sugar	2013	2.57	210	D.15-08-023; D.15-12-041	539.70			
Subtotal: \$209,762.30						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Matthew Freedman	2012	1.75	\$187.50	D.15-05-019 (@50% of \$375)	328.13			
Matthew Freedman	2014	1	\$205	D.15-06-021 (@50% of \$410)	205.00			
Matthew Freedman	2016	15	\$205	D.16-06-024 (@ 50% of \$415)	3,112.50			
Subtotal: \$3,645.63						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
1	Copies	Copies for pleadings and hearings			165.68			
2	Postage	Costs of mailing copies of pleadings			40.93			
Subtotal: \$206.61						Subtotal: \$		
TOTAL REQUEST: \$ 213,614.54						TOTAL AWARD: \$		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								

Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Matthew Freedman	March 2001	214812	No
Marcel Hawiger	January 1998	194244	No
Hayley Goodson	December 2003	228535	No
Nina Suetake	December 2004	234769	No

C. Attachments Documenting Specific Claim and Comments on Part III (Intervenor completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Cost/expense details

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (see § 1804(c))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor’s representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal

Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor's request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

Attachment 1

Certificate of Service

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

Attachment 2

Attorney Time Sheet Detail

A.12-01-008/A.12-04-020/A.14-01-007 - HOURS

Date	Atty	Task	Description	Time Spent
<u>TURN analyst: Eric Borden</u>				
2/20/15	Eric Borden	GP	Read through decision on GTSR program and phase 4 issues A.12-01-008	2.25
2/23/15	Eric Borden	GP	Summary email of PHC issues to Matt and Hayley	0.50
2/23/15	Eric Borden	EH	Attend and participate in GTSR PHC and summary email for Matt and Hayley A.12-01-008	1.50
Total: Eric Borden				4.25
<u>Attorney: Hayley Goodson</u>				
2/5/14	Hayley Goodson	EH	review Matt's testimony, discuss cross defense with Matt, and attend hearings to defend him	3.00
Total: Hayley Goodson				3.00
<u>Expert: JBS--John Sugar</u>				
7/23/12	John Sugar	GP	PG&E Renewable Program	0.41
7/24/12	John Sugar	#	Review PG&E testimony, TURN protest, other programs	6.04
7/25/12	John Sugar	PROCURE	research, evaluate NREL ident. existing programs	3.41
7/26/12	John Sugar	PROCURE	Research impact of long-term REC contracts on proj. deve	1.08
7/31/12	John Sugar	PROCURE	PG&E Renewable Program Draft initial approach for test.	0.33
8/2/12	John Sugar	EH	PG&E Renewable Program: Prep and participate in workshop	3.50
8/17/12	John Sugar	EH	PG&E Renewable Program, Analyze, respond to Worrkshop issues Rpt.	0.58
9/12/12	John Sugar	PROCURE	Review cost of Calif RECs, quick review of EERE Report	3.16
9/13/12	John Sugar	PROCURE	Review TVA Green Power Switch , and power partners	0.84
9/18/12	John Sugar	PROCURE	Sign NDA, Evaluate TVA Program vs. other utility efforts	0.33
9/19/12	John Sugar	PROCURE	Research other utility programs, call w/ TVA	1.25
9/20/12	John Sugar	PROCURE	Search for REC Cost and Impact infor. Study EERE Rpt.	2.33
9/21/12	John Sugar	#	Contact utilities re: programs, review PG&E testim	1.08
9/27/12	John Sugar	PROCURE	Discuss.n w Puget Sound Elect re Green Power Prog	0.25
9/30/12	John Sugar	PROCURE	Discuss w/ TURN, Rev. PG&E backup & other util progs	1.58
10/8/12	John Sugar	PROCURE	Rev. PG&E DR rev., outline testimony re: cust surveys	4.66
10/9/12	John Sugar	#	Develop references, outline Testimony	4.41
10/10/12	John Sugar	#	Outline, begin drafting testimony, speak w/ TURN	4.50
10/12/12	John Sugar	#	Draft Testimony, review added NREL NYSERDA docs	4.75
10/15/12	John Sugar	#	Revise Test. in light of CCSF DR response	4.24
10/16/12	John Sugar	#	Add NYSERDA mat'ls to test., review NREL studies	4.41
10/17/12	John Sugar	#	Complete and Submit draft testimony	1.25
10/18/12	John Sugar	#	Rev. test., review DR responses, submit test	3.08
1/4/13	John Sugar	PG&E/SETT	Discuss Options and analysis w/ TURN	0.33
1/6/13	John Sugar	PG&E/SETT	Review Settlement Proposal	0.50
1/7/13	John Sugar	PG&E/SETT	Review PG&E Testimony, comment on sett. proposal	0.75
3/4/13	John Sugar	PG&E/SETT	Review Settlement Proposal	0.41
4/5/13	John Sugar	PG&E/SETT	Review, comment on Proposed Settlement	0.58
Total: JBS -- John Sugar				60.04
<u>Attorney: Matt Freedman</u>				
2/15/12	Matt Freedman	GP	Review of SDG&E application, drafting of TURN protest	2.50
4/25/12	Matt Freedman	GP	Review of PG&E application and testimony	1.25
5/22/12	Matt Freedman	GP	Drafting of TURN protest	1.75
6/25/12	Matt Freedman	GP	Discussion with Nina Suetake re: PHC strategy	0.50
7/6/12	Matt Freedman	GP	Communication with Nina Suetake and Bill Marcus re: schedule and TURN staffing	0.50
7/16/12	Matt Freedman	GP	Conversation with Bill Marcus re: TURN testimony and positions	0.25
7/16/12	Matt Freedman	GP	Conversation with Gene Wilson (Sierra Club) re: intervenor coordination and case issues	0.50
7/23/12	Matt Freedman	GP	Discussion with John Sugar (JBS) re: case issues and possible testimony	0.50
7/24/12	Matt Freedman	Comp	Preparation of NOI	1.00
8/2/12	Matt Freedman	EH	Preparation for, and attendance at, Green Option CPUC workshop	4.00
8/17/12	Matt Freedman	#	Review of Common Issues Draft circulated by PG&E, edits to the outline, incorporation of edits by John Sugar	1.00
9/19/12	Matt Freedman	PROCURE	Review and edits to TURN data request #1	0.50
9/19/12	Matt Freedman	GP	Review and execution of NDA	0.50
9/21/12	Matt Freedman	PROCURE	Revision to TURN DR#1 and resubmission to PG&E	0.50

A.12-01-008/A.12-04-020/A.14-01-007 - HOURS

Date	Atty	Task	Description	Time Spent
9/26/12	Matt Freedman	GP	Meet with Nina Suetake to discuss case strategy issues	0.50
9/27/12	Matt Freedman	#	Drafting proposal for TURN Green Option alternative	0.50
9/28/12	Matt Freedman	#	Discussion with John Sugar (JBS) re: green option alternative, drafting of alternative proposal outline	1.00
10/1/12	Matt Freedman	#	Discussion with David Rubin (PG&E) re: alternative Green Option program designs	1.00
10/2/12	Matt Freedman	#	Additional drafting/brainstorming about TURN Green Option alternative	1.00
10/5/12	Matt Freedman	EH	Attendance at Prehearing Conference	1.00
10/5/12	Matt Freedman	GP	Review of SDG&E application and case materials in preparation for PHC	1.00
10/5/12	Matt Freedman	Comp	Drafting of NOI	0.75
10/11/12	Matt Freedman	#	Edits to TURN Green Option proposal (including research on pricing options), communication with TURN consultants (JBS Energy) re: updated proposal ideas and case scheduling issues	0.75
10/11/12	Matt Freedman	PG&E/SETT	Discussion with Chris Warner (PG&E) re: TURN Green option proposal and case management issues	0.50
10/11/12	Matt Freedman	PG&E/SETT	Meeting with CCUE (Marc Joseph) re: TURN Green option proposal	0.75
10/16/12	Matt Freedman	#	Review of John Sugar draft testimony, phone call to discuss testimony issues	1.00
10/17/12	Matt Freedman	#	Review/edits to John Sugar testimony	1.75
10/18/12	Matt Freedman	#	Review/edits to John Sugar testimony, discussion with John Sugar re: testimony issues	3.50
10/19/12	Matt Freedman	GP	Initial review of testimony submitted by other intervenors	1.00
12/10/12	Matt Freedman	#	Review of PG&E rebuttal testimony and the direct testimony of Sierra Club, DACC/MEA, and the Joint Parties	2.25
12/10/12	Matt Freedman	PG&E/SETT	Preparation for settlement meeting with PG&E	0.50
12/11/12	Matt Freedman	PG&E/SETT	Settlement meeting with PG&E (David Rubin) at PG&E offices	2.50
12/19/12	Matt Freedman	PG&E/SETT	Review of notes from first settlement meeting, planning for second settlement meeting	0.50
12/20/12	Matt Freedman	PG&E/SETT	Initial drafting of settlement term sheet	0.50
12/20/12	Matt Freedman	PG&E/SETT	Settlement meeting with PG&E	3.50
1/4/13	Matt Freedman	PG&E/SETT	Discussion with John Sugar (JBS) re: settlement negotiations and term sheet	0.50
1/4/13	Matt Freedman	PG&E/SETT	Drafting of settlement term sheet	3.50
1/7/13	Matt Freedman	PG&E/SETT	Final edits to settlement term sheet	0.50
1/8/13	Matt Freedman	PG&E/SETT	Discussion with Joint Parties (Shalini Swaroop) re: Green Option proposals	0.25
1/8/13	Matt Freedman	PG&E/SETT	Meeting with CCSF to discuss Green Option proposals	1.50
1/8/13	Matt Freedman	PG&E/SETT	Discussion with Chris Warner (PG&E) re: Green Option settlement issues	0.25
1/10/13	Matt Freedman	PG&E/SETT	Settlement meeting with PG&E and CUE (@PG&E)	2.50
1/11/13	Matt Freedman	GP	Communication with PG&E (Chris Warner) re: TURN/PG&E/CUE request for delay in hearings	0.25
1/15/13	Matt Freedman	PG&E/SETT	Attendance at settlement meeting with PG&E and CUE	2.50
1/15/13	Matt Freedman	PG&E/SETT	Phone call with Eugene Wilson (Sierra Club) re: settlement process, evidentiary hearings and other case issues	0.50
1/15/13	Matt Freedman	GP	Communications with various parties re: rescheduling hearings to focus on settlement negotiations	0.50
1/15/13	Matt Freedman	GP	Review of case correspondence, notes to Dan Douglas and Eugene Wilson, and notes to ALJ / service list urging delay in hearings	0.25
1/17/13	Matt Freedman	PG&E/SETT	Communications with Chris Warner (PG&E) and Eugene Wilson (Sierra Club) re: settlement schedule and related issues	0.75
1/17/13	Matt Freedman	PG&E/SETT	Conversation with Marc Joseph (CCUE) re: settlement strategy and issues	0.50
1/22/13	Matt Freedman	PG&E/SETT	Review of draft settlement term sheet	0.50
1/22/13	Matt Freedman	PG&E/SETT	Discussion with David Rubin (PG&E) re: settlement documents	0.50
1/22/13	Matt Freedman	PG&E/SETT	Meeting with Sierra Club (Eugene Wilson and others) to discuss settlement process and case issues	1.00
1/23/13	Matt Freedman	PG&E/SETT	Discussion with CUE (Marc Joseph) re: settlement process and issues	0.25
1/23/13	Matt Freedman	PG&E/SETT	Settlement meeting with PG&E, CUE, AREM, CCSF, Sierra Club and Greenlining	4.00
1/24/13	Matt Freedman	PG&E/SETT	Discussion with Greenlining re: settlement process	0.75
1/24/13	Matt Freedman	PG&E/SETT	Discussion with AREM/MEA/DACC (Dan Douglass) re: settlement process	0.25
1/24/13	Matt Freedman	PG&E/SETT	Review of draft settlement term sheet	0.50
1/25/13	Matt Freedman	PG&E/SETT	Settlement meeting at PG&E	5.50
1/28/13	Matt Freedman	EH	Attendance at Workshop Day 1	4.50
1/29/13	Matt Freedman	PG&E/SETT	Communications with PG&E and CCSF re: settlement issues, review of CCSF information request	0.25
1/29/13	Matt Freedman	EH	Attendance at Workshop Day 2	4.00
1/30/13	Matt Freedman	EH	Attendance at Workshop Day 3	4.50
1/31/13	Matt Freedman	#	Work responding to CCSF data request re: accounting of costs and revenues	0.75
1/31/13	Matt Freedman	PG&E/SETT	Discussion with CCSF re: settlement issues	0.50
2/1/13	Matt Freedman	PG&E/SETT	Discussion with CCUE (Marc Joseph) re: settlement negotiations	0.25
2/1/13	Matt Freedman	PG&E/SETT	Discussion with PG&E re: settlement negotiations	0.50

A.12-01-008/A.12-04-020/A.14-01-007 - HOURS

Date	Atty	Task	Description	Time Spent
2/1/13	Matt Freedman	PROCURE	Discussion with California AG office (Raissa Lerner) re: Green Option proceeding and green marketing issues	1.00
2/4/13	Matt Freedman	PG&E/SETT	Settlement meeting at PG&E	4.00
2/6/13	Matt Freedman	PG&E/SETT	Settlement meeting at PG&E	2.00
2/6/13	Matt Freedman	PG&E/SETT	Review of proposed pricing mechanism, recent RAM results, and development of template for settlement	0.75
2/7/13	Matt Freedman	PG&E/SETT	Settlement meeting at PG&E	3.00
2/13/13	Matt Freedman	PG&E/SETT	Settlement meeting at PG&E	2.50
2/13/13	Matt Freedman	PG&E/SETT	Discussion with PG&E (David Rubin) re: settlement issues	0.50
2/13/13	Matt Freedman	PG&E/SETT	Discussion with CUE (Marc Joseph) re: settlement issues	0.50
2/13/13	Matt Freedman	PG&E/SETT	Discussion with Sierra Club (Eugene Wilson) re: settlement issues	0.25
2/15/13	Matt Freedman	PG&E/SETT	Settlement meeting at PG&E	3.50
2/20/13	Matt Freedman	PG&E/SETT	Conference call to discuss joint PHC statement	0.50
2/20/13	Matt Freedman	EH	Review of draft joint PHC statement and development of cross examination estimates	0.25
2/20/13	Matt Freedman	PG&E/SETT	Discussion with PG&E (Chris Warner) re: settlement issues	0.50
2/20/13	Matt Freedman	PG&E/SETT	Discussion with the Joint Parties (Shalini Swaroop) re: settlement issues	0.25
2/22/13	Matt Freedman	PG&E/SETT	Meeting with CCSF (Meg Meal) and Sierra Club (Eugene Wilson) to discuss settlement issues	1.00
2/22/13	Matt Freedman	PG&E/SETT	Settlement meeting at PG&E	4.50
2/27/13	Matt Freedman	EH	Attendance at PHC and post-PHC conversation with settling parties	1.00
2/27/13	Matt Freedman	PG&E/SETT	Call with Marc Joseph (CUE) to discuss settlement issues	0.25
2/28/13	Matt Freedman	PG&E/SETT	Call with Sierra Club (Eugene Wilson) to discuss settlement issues	0.25
2/28/13	Matt Freedman	PG&E/SETT	Participation in Settlement meeting @ PG&E	4.00
2/28/13	Matt Freedman	PG&E/SETT	Drafting of revisions to settlement term sheet	0.50
2/28/13	Matt Freedman	PG&E/SETT	Call with DRA (Sarah Thomas) to discuss settlement issues and DRA participation	0.25
3/1/13	Matt Freedman	PG&E/SETT	Redrafting of settlement term sheet	2.00
3/2/13	Matt Freedman	PG&E/SETT	Additional drafting of settlement term sheet	2.00
3/4/13	Matt Freedman	PG&E/SETT	Review of PG&E and Sierra Club edits to settlement term sheet, discussion with Marc Joseph re: CUE edits to term sheet	1.00
3/5/13	Matt Freedman	PG&E/SETT	Green Option settlement meeting with PG&E and CUE	2.50
3/6/13	Matt Freedman	PG&E/SETT	Meeting with Sierra Club (Gene Wilson) to discuss settlement issues	1.00
3/6/13	Matt Freedman	PG&E/SETT	Meeting with PG&E and CUE to discuss settlement	1.00
3/6/13	Matt Freedman	PG&E/SETT	Call with DRA (Sarah Thomas) to discuss settlement issues	0.50
3/6/13	Matt Freedman	PG&E/SETT	Edits to settlement document	1.50
3/7/13	Matt Freedman	PG&E/SETT	Final edits to draft settlement term sheet for distribution to settling parties	0.50
3/7/13	Matt Freedman	GP	Telephonic PHC with ALJ and parties to discuss hearing schedule	0.50
3/7/13	Matt Freedman	PG&E/SETT	Discussion with PG&E (Chris Warner) re: schedule for settlement conference and process for resolving remaining term sheet issues	0.25
3/11/13	Matt Freedman	#	Review of SDG&E SunRate program testimony and workshop notes in preparation for meeting with SDG&E	0.50
3/11/13	Matt Freedman	#	Phone conversation with SDG&E to discuss TURN recommendations for SunRate issues	1.50
3/11/13	Matt Freedman	PG&E/SETT	Review of communication between settling parties regarding settlement conference, edits suggested by CCSF, and edits suggested by Sierra Club	0.25
3/13/13	Matt Freedman	PG&E/SETT	Meeting by phone with DRA (Sarah Thomas) and PG&E to discuss settlement term sheet, post-meeting drafting of email addressing DRA concerns	1.50
3/15/13	Matt Freedman	PG&E/SETT	Communication with DRA re: settlement concerns	0.25
3/18/13	Matt Freedman	PG&E/SETT	Review/edits to PG&E draft summary of term sheet for circulation to parties attending settlement conference	0.50
3/21/13	Matt Freedman	PG&E/SETT	Communication with DRA re: settlement issues and legal questions	0.50
3/22/13	Matt Freedman	PG&E/SETT	Settlement meeting with CUE and PG&E	3.00
3/22/13	Matt Freedman	PG&E/SETT	Edits to the settlement term sheet	0.25
3/26/13	Matt Freedman	PG&E/SETT	Review of revised term sheet	0.25
3/26/13	Matt Freedman	PG&E/SETT	Settlement conference (@ PG&E) with all active parties	3.00
4/1/13	Matt Freedman	PG&E/SETT	Review and edits to draft settlement motion	1.00
4/1/13	Matt Freedman	PG&E/SETT	Discussion with PG&E (David Rubin) re: settlement issues	0.50
4/1/13	Matt Freedman	PG&E/SETT	Discussion with Sierra Club (Eugene Wilson) re: settlement issues	0.25
4/3/13	Matt Freedman	PG&E/SETT	Review/edits to draft settlement motion	1.25
4/4/13	Matt Freedman	#	Drafting of TURN opening brief on policy and legal issues	1.50
4/5/13	Matt Freedman	#	Drafting of TURN opening brief on policy and legal issues	3.50
4/5/13	Matt Freedman	PG&E/SETT	Review of settlement motion/settlement document and communications with settling parties	0.50
4/8/13	Matt Freedman	#	Initial review and summary notes of opening briefs submitted by other parties	1.00
4/8/13	Matt Freedman	#	Drafting of TURN opening brief on policy and legal issues	4.00
4/9/13	Matt Freedman	PG&E/SETT	Review and edits to settlement agreement, communication with settling parties re: final changes	1.25

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Date	Atty	Task	Description	Time Spent
4/10/13	Matt Freedman	PG&E/SETT	Final review and execution of settlement	0.50
4/11/13	Matt Freedman	PG&E/SETT	In-person briefing with Solar Parties (Vote Solar, Recurrent, SunEdison) re: settlement provisions	2.00
4/19/13	Matt Freedman	PG&E/SETT	Review of communications re: meetings w/ED staff, meetings with DRA and other coordination with settling parties re: Commission approval	0.50
4/23/13	Matt Freedman	#	Meeting with SDG&E (by phone) to discuss SunRate testimony and PG&E settlement	1.00
4/23/13	Matt Freedman	PG&E/SETT	Meeting with PG&E and CUE (by phone) to discuss Settlement presentation for ED	0.50
4/23/13	Matt Freedman	PG&E/SETT	Preparation for presentation of settlement to ED staff	0.50
4/23/13	Matt Freedman	PG&E/SETT	Meeting with ED staff to discuss settlement	1.50
4/25/13	Matt Freedman	#	Review of opening briefs filed by other parties, initial outline for TURN reply brief	3.50
4/26/13	Matt Freedman	#	Drafting of TURN reply brief on legal and policy issues	3.00
4/29/13	Matt Freedman	PG&E/SETT	Review of draft data responses to DRA	0.25
4/30/13	Matt Freedman	PG&E/SETT	Meeting with DRA and PG&E (by phone) to discuss settlement issues	1.00
5/2/13	Matt Freedman	PG&E/SETT	Discussion with MEA (Beth Kelly) by phone re: Green Option settlement and MEA concerns	0.50
5/3/13	Matt Freedman	PG&E/SETT	Review/edits to draft Joint Parties responses to MEA data request	0.25
5/9/13	Matt Freedman	COMPIMPACTS	Review of draft joint response to AREM/DACC stipulation, edits to draft	1.00
5/9/13	Matt Freedman	#	Discussion with SDG&E (Greg Barnes) re: case issues and possible settlement	0.25
5/12/13	Matt Freedman	COMPIMPACTS	Review/edits to draft Settling parties response to Shell/AREM joint stipulation	0.75
5/13/13	Matt Freedman	#	Initial review of updated SDG&E direct testimony -- revised Ch. 1, 2, 3, 4	1.50
5/14/13	Matt Freedman	COMPIMPACTS	Review of comments on settlement and stipulation submitted by other parties	1.25
5/21/13	Matt Freedman	GP	Review of draft Joint Parties comments opposing MEA motion to consolidate proceeding	0.25
5/21/13	Matt Freedman	PG&E/SETT	Review/edits to response of Joint Parties to comments of various parties opposing settlement	0.50
5/22/13	Matt Freedman	#	Review of revised SDG&E testimony in preparation for settlement meeting with SDG&E	0.75
5/22/13	Matt Freedman	PG&E/SETT	Review/edits to response of Joint Parties to comments of various parties opposing settlement	1.00
5/24/13	Matt Freedman	#	Settlement call with SDG&E and CUE	1.50
5/24/13	Matt Freedman	#	Call with CUE (Marc Joseph, Jamie Maudlin) re: settlement strategy	0.50
5/28/13	Matt Freedman	PG&E/SETT	Review/edits to response of settling parties to comments on the settlement	1.00
5/30/13	Matt Freedman	#	Consultation with SDG&E and drafting request for extension of schedule to accommodate settlement negotiations	0.25
5/31/13	Matt Freedman	PG&E/SETT	Discussion with Recurrent Energy (John Nimmons) re: Green Option settlement	0.50
6/11/13	Matt Freedman	#	Review of settlement materials provided by SDG&E	0.50
6/12/13	Matt Freedman	#	Phone conference with IREC re: settlement	1.00
6/12/13	Matt Freedman	#	Settlement meeting with SDG&E	1.50
6/12/13	Matt Freedman	#	Drafting of settlement language re: RPS compliance	0.25
6/13/13	Matt Freedman	RATE	Review of IREC proposal, correspondence with Kevin Woodruff re: solar value adjustment and IREC proposal	0.50
6/20/13	Matt Freedman	#	Discussion with DRA re: settlement issues for SunRate	0.50
6/21/13	Matt Freedman	#	Discussion w/SDG&E (Greg Barnes) re: settlement, ALJ ruling and case issues	0.25
6/21/13	Matt Freedman	PG&E/SETT	Discussion w/PG&E (Chris Warner) re: settlement and case issues	0.25
7/31/13	Matt Freedman	GP	Review of Peevey ruling re: consolidation with A.12-01-008 and PHC date, communication with PG&E re: PHC issues and strategy, communication with TURN attorneys re: PHC date, communication with Vote Solar re: consolidation issues	0.50
8/12/13	Matt Freedman	RATE	Meeting with IREC (Joe Wiedeman) by phone to discuss solar docket consolidation, scheduling and other case issues	0.50
8/13/13	Matt Freedman	GP	Individual phone and email communications with PG&E, SDG&E, IREC and other parties re: PHC scheduling and coordinated request for a delay; Communication with ALJ re: PHC rescheduling	0.75
9/17/13	Matt Freedman	GP	Review/edits to draft joint case management statement provided by PG&E/SDG&E	0.50
9/18/13	Matt Freedman	COMPIMPACTS	Review of reactions to draft case management statement, drafting of TURN response to MEA and Shell	0.50
9/20/13	Matt Freedman	GP	Communication with various parties re: joint case management statement, case scheduling, and upcoming PHC	0.50
9/23/13	Matt Freedman	GP	Discussions with PG&E, SDG&E, Sierra Club re: Joint Case management statement, meeting with settling parties to discuss PHC strategy	1.50
10/16/13	Matt Freedman	#	Review of SDG&E draft settlement term sheet, edits to term sheet, discussion with Marc Joseph (CUE) re: settlement terms, drafting of email to SDG&E (Greg Barnes) outlining TURN's proposed changes to the draft settlement	2.00
10/17/13	Matt Freedman	GP	Review of ALJ Clark ruling re: schedule, communication with PG&E/SDG&E re: schedule and case issues	0.25
11/6/13	Matt Freedman	PG&E/SETT	Preparation for meeting with PG&E and settling parties -- review of ALJ ruling and other case materials	0.25

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Date	Atty	Task	Description	Time Spent
11/6/13	Matt Freedman	PG&E/SETT	Meeting with PG&E, CUE, Sierra Club, Joint Parties to discuss November 15 filing, testimony and other case strategy issues; post-meeting discussions with CUE	2.25
11/13/13	Matt Freedman	PG&E/SETT	Review/edits to PG&E filing on Green Option settlement comparison with SB 43 provisions	1.25
11/17/13	Matt Freedman	ECR	Communication with Sierra Club re: community renewables provision in PG&E settlement and next steps	0.25
11/20/13	Matt Freedman	#	Communication with Recurrent Energy (John Nimmons) re: settlement of SDG&E application	0.25
12/4/13	Matt Freedman	#	Review of draft PG&E testimony, comments/edits to PG&E draft	1.00
12/6/13	Matt Freedman	#	Review of PG&E updated testimony on Green Option tariff	0.50
12/17/13	Matt Freedman	#	Review of updated SDG&E testimony, development of outline for comments	2.50
12/17/13	Matt Freedman	#	Review of updated PG&E testimony	1.75
12/18/13	Matt Freedman	#	Settlement discussion with SDG&E re: revised CTTS program testimony	1.00
12/19/13	Matt Freedman	GP	Discussion with CBE (Roger Lin) re: coordination on comments to PG&E/SDG&E revised proposals	0.25
12/19/13	Matt Freedman	#	Drafting of comments on updated IOU proposals	3.00
12/20/13	Matt Freedman	#	Drafting of comments on updated IOU proposals	4.00
1/3/14	Matt Freedman	#	Review of PG&E and SDG&E reply comments	0.25
1/3/14	Matt Freedman	#	Review of SDG&E revised proposal, meeting with SDG&E and CUE to discuss settlement	1.50
1/8/14	Matt Freedman	#	Settlement meeting with CUE and SDG&E	1.25
1/10/14	Matt Freedman	GP	Initial review of testimony submitted by various parties	1.50
1/10/14	Matt Freedman	GP	Initial review of SCE Green Rate application	0.75
1/14/14	Matt Freedman	PG&E/SETT	Settlement meeting with ORA and PG&E	1.50
1/14/14	Matt Freedman	PG&E/SETT	Post-settlement meeting discussion with PG&E re: case strategy relating to settlement	0.25
1/16/14	Matt Freedman	ECR	Discussion with Vote Solar (Susannah Churchill) re: PG&E and SDG&E applications, possible models for shared solar, and procedural options	0.50
1/18/14	Matt Freedman	#	Detailed review of opening testimony by intervenor parties, initial outline of rebuttal testimony, review of relevant precedents	5.00
1/19/14	Matt Freedman	#	Drafting of rebuttal testimony	6.50
1/20/14	Matt Freedman	#	Drafting of rebuttal testimony	3.50
1/20/14	Matt Freedman	#	Review/feedback to PG&E on draft rebuttal testimony	0.50
1/21/14	Matt Freedman	#	Final drafting/review/edits to rebuttal testimony	2.50
1/21/14	Matt Freedman	GP	Review of rebuttal testimony by other parties, preparation of cross-examination estimates	1.50
1/22/14	Matt Freedman	ECR	Meeting with Vote Solar/IREC (in person) to discuss GTSR application issues and enhanced community renewables proposals	1.50
1/22/14	Matt Freedman	ECR	In-person meeting with Community Energy Corporation (Genevieve Liang) to discuss customer investment option for GTSR projects	1.25
1/23/14	Matt Freedman	PG&E/SETT	Review/edits to PG&E/TURN response to ORA settlement offer	0.50
1/27/14	Matt Freedman	EH	Preparation for evidentiary hearings	1.50
1/28/14	Matt Freedman	EH	Attendance at evidentiary hearings	4.50
1/28/14	Matt Freedman	EH	Preparation of cross-examination for Shell, IREC witnesses	1.50
1/28/14	Matt Freedman	EH	Review of transcript	0.25
1/29/14	Matt Freedman	ECR	Meeting with PG&E to discuss schedule changes and enhanced shared community renewable energy program	1.00
1/29/14	Matt Freedman	EH	Review of transcript	0.25
1/29/14	Matt Freedman	EH	Attendance at evidentiary hearings	5.00
1/30/14	Matt Freedman	EH	Attendance at evidentiary hearings	5.00
1/30/14	Matt Freedman	EH	Review of transcript	0.25
2/3/14	Matt Freedman	#	Meeting (in-person) with PG&E (David Rubin) and Energy Division (Gabe Petlin) to discuss GTSR case issues and community renewables options	1.00
2/3/14	Matt Freedman	ECR	Post-meeting discussion with PG&E (David Rubin) re: next steps for Enhanced Shared Community Renewables Program design	0.50
2/3/14	Matt Freedman	EH	Preparation of cross-examination for ORA, MCE, CCSF witnesses	3.00
2/4/14	Matt Freedman	COMPIMACTS	Post-hearing discussion with Shell (John Leslie) re: case issues	0.50
2/4/14	Matt Freedman	EH	Participation/attendance at evidentiary hearings	4.50
2/5/14	Matt Freedman	EH	Participation/attendance at evidentiary hearings	5.50
2/6/14	Matt Freedman	ECR	Meeting (telephone) with City of Davis (Howard Golub and others) to discuss Enhanced Shared Renewables Program option	1.50
2/6/14	Matt Freedman	PROCURE	Review of CCSF data request to TURN. Initial drafting of TURN response.	0.50
2/11/14	Matt Freedman	ECR	Discussion with PG&E (phone) re: shared community renewables proposal	1.00
2/11/14	Matt Freedman	PROCURE	Drafting response to CCSF Data Request #1 to TURN	2.50
2/12/14	Matt Freedman	ECR	Meeting with PG&E and settling parties (by phone) re: shared community renewables proposal, post-meeting call with CUE (Marc Joseph) re: case strategy	1.25

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Date	Atty	Task	Description	Time Spent
2/14/14	Matt Freedman	ECR	Settlement meeting (phone) with PG&E and other parties re: enhanced shared community renewables program, post-meeting call with PG&E to debrief	1.50
2/18/14	Matt Freedman	PROCURE	Final edits and distribution of TURN response to CCSF data request	0.50
2/18/14	Matt Freedman	GP	Review of SCE application/testimony, legal research, initial outline of protest	2.50
2/19/14	Matt Freedman	GP	Drafting of TURN protest	3.50
2/19/14	Matt Freedman	%	Drafting of TURN data request #1 to SCE	1.50
2/19/14	Matt Freedman	ECR	Meeting with Vote Solar (Susannah Churchill) to discuss PG&E enhanced community renewables proposal	0.75
2/19/14	Matt Freedman	ECR	Meeting with Clean Coalition/CEJA to discuss PG&E enhanced community renewables proposal	0.75
2/20/14	Matt Freedman	GP	Final edits to joint TURN/CUE protest	0.50
2/20/14	Matt Freedman	%	Final edits to TURN DR#1 to SCE	0.25
2/27/14	Matt Freedman	GP	Review and execution of NDA	0.25
3/10/14	Matt Freedman	EH	Preparation for PHC, review of pleadings/protests/response to protests	0.50
3/10/14	Matt Freedman	EH	Participation at PHC	1.00
3/12/14	Matt Freedman	%	Review of amended SCE testimony, preparation for meeting with SCE	0.50
3/12/14	Matt Freedman	%	Meeting with SCE (by phone) to discuss Green Rate application issues	1.25
3/12/14	Matt Freedman	%	Meeting with CUE (by phone) to discuss Green Rate application issues re: Enhanced	0.50
3/14/14	Matt Freedman	ECR	Review of opening and reply comments by various parties re: PG&E Enhanced Community Renewables proposal	2.50
3/20/14	Matt Freedman	#	Review of case materials in preparation for briefing	1.50
3/20/14	Matt Freedman	#	Drafting opening brief on PG&E and SDG&E GTSR proposals	6.00
3/21/14	Matt Freedman	#	Drafting/editing opening brief on PG&E and SDG&E GTSR proposals	5.00
4/1/14	Matt Freedman	GP	Review of ALJ ruling, communication with parties, email to service list re: scheduling issues	0.25
4/1/14	Matt Freedman	GP	Call with PG&E to discuss case schedule, scope and ECR hearings	0.25
4/4/14	Matt Freedman	comp	Drafting of NOI	1.00
4/4/14	Matt Freedman	#	Review of SDG&E settlement proposal	0.50
4/4/14	Matt Freedman	#	Settlement call with SDG&E and other parties to discuss possible resolution of various issues	1.00
4/7/14	Matt Freedman	#	Review of opening briefs submitted by various parties, drafting of outline for TURN reply brief, drafting of TURN reply brief sections	6.50
4/8/14	Matt Freedman	#	Drafting of TURN reply brief	6.00
4/8/14	Matt Freedman	GP	Review of ALJ ruling and service list comments on schedule/scope issues, communication with Vote Solar re: scope/schedule/hearing issues	0.25
4/9/14	Matt Freedman	#	Drafting/edits to TURN reply brief on PG&E and SDG&E GTSR programs	3.25
4/9/14	Matt Freedman	%	Review of SCE application/testimony and other materials, initial outline for TURN te	3.50
4/9/14	Matt Freedman	%	Review of SCE response to TURN DR#1, drafting TURN data request #2	0.75
4/10/14	Matt Freedman	%	Review of SCE testimony, drafting of TURN testimony	3.25
4/10/14	Matt Freedman	#	Review of revised SDG&E settlement proposal, participation in settlement meeting	1.50
4/11/14	Matt Freedman	%	Drafting/editing TURN testimony on SCE Green Rate	4.00
4/11/14	Matt Freedman	%	Additional drafting/editing of TURN DR#2 to SCE	0.50
4/15/14	Matt Freedman	%	Initial review of opening testimony and service list correspondence, preparation of i	1.00
4/21/14	Matt Freedman	%	Review of SCE data responses, SCE rebuttal testimony	1.50
4/21/14	Matt Freedman	EH	Prep for hearings and cross-exam development	2.25
4/22/14	Matt Freedman	EH	Participation in evidentiary hearings	4.50
4/22/14	Matt Freedman	EH	Preparation prior to Tuesday hearings	0.50
4/22/14	Matt Freedman	EH	Preparation of cross-examination for SCE witnesses	2.50
4/23/14	Matt Freedman	EH	Participation in evidentiary hearings	5.00
4/23/14	Matt Freedman	EH	Preparation of cross-examination for IREC/ORR witnesses	1.25
4/24/14	Matt Freedman	EH	Participation in evidentiary hearings	4.75
4/30/14	Matt Freedman	EH	Review of transcripts and other hearing materials in preparation for brief, develo	1.75
4/30/14	Matt Freedman	#	Review of SDG&E settlement proposal/joint recommendation	1.25
5/1/14	Matt Freedman	#	Review of SDG&E settlement proposal/joint recommendation, edits, meeting with SDG&E to discuss issues	1.50
5/1/14	Matt Freedman	%	Drafting of TURN opening brief	6.50
5/2/14	Matt Freedman	%	Drafting of TURN opening brief	6.00
5/2/14	Matt Freedman	#	Final review of SDG&E settlement proposal/joint recommendation, edits to draft joint motion, correspondence with SDG&E and other parties	0.75
5/4/14	Matt Freedman	ECR	Review of hearing transcripts, case materials, initial outlining and drafting of opening brief on PG&E ECR issues	4.25
5/5/14	Matt Freedman	#	Drafting of TURN response to SDG&E Joint Parties Motion re: Joint Recommendation	1.50
5/5/14	Matt Freedman	ECR	Drafting of TURN opening brief on PG&E ECR issues	4.50
5/5/14	Matt Freedman	%	Review of opening briefs filed by other parties, outline of TURN reply brief	3.50
5/6/14	Matt Freedman	%	Drafting of TURN reply brief	4.25
5/7/14	Matt Freedman	%	Review/edits to TURN reply brief	1.50

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Date	Atty	Task	Description	Time Spent
5/7/14	Matt Freedman	ECR	Review of opening briefs on PG&E ECR program submitted by other parties, drafting of TURN reply brief	4.50
5/23/14	Matt Freedman	GP	Review of Peevey ruling establishing Phase 3	0.25
6/5/14	Matt Freedman	GP	Discussion with Energy Division staff re: GTSR case issues	0.25
7/9/14	Matt Freedman	GP	Communication w/PG&E re: ex-parte meetings on GTSR	0.25
7/11/14	Matt Freedman	GP	Communication with ED staff in response to questions from Gabe Petlin	0.25
9/23/14	Matt Freedman	GP	Review of ALJ ruling requesting hard copies of all exhibits in proceeding, review of TURN exhibits, organization of TURN materials for printing	0.50
9/24/14	Matt Freedman	GP	Review/organization of TURN exhibits based on ALJ ruling requiring new hard copy submissions	0.25
12/11/14	Matt Freedman	GP	Review of ALJ ruling re: status conference, review of D.14-11-042, review of SB 43 requirements, review of case materials, drafting of outline for status conference	2.25
12/12/14	Matt Freedman	GP	Attendance at status conference	0.25
12/12/14	Matt Freedman	#	Drafting of TURN opening brief in response to ALJ ruling	1.50
12/15/14	Matt Freedman	#	Drafting of TURN opening brief in response to ALJ ruling	1.50
12/18/14	Matt Freedman	#	Review/edits to TURN opening brief on RAM/RIC issues in response to ALJ ruling	0.75
12/19/14	Matt Freedman	#	Review of opening briefs submitted by other parties	1.75
12/21/14	Matt Freedman	#	Review of reply briefs submitted by other parties	1.25
12/30/14	Matt Freedman	GP	Initial review of McKinney Proposed Decision	1.25
1/13/15	Matt Freedman	GP	Discussion with CCUE (Marc Joseph) re: GTSR PD and coordinating comments	0.50
1/13/15	Matt Freedman	#	Review of McKinney PD and development of outline for opening comments	1.50
1/14/15	Matt Freedman	#	Review of McKinney PD and drafting of opening comments	4.50
1/15/15	Matt Freedman	#	Consultation with PG&E and SDG&E re: McKinney PD and revisions to TURN opening comments	1.25
1/20/15	Matt Freedman	#	Final edits to opening comments on McKinney PD	0.50
1/27/15	Matt Freedman	GP	Review of reply comments submitted by other parties	1.00
1/27/15	Matt Freedman	GP	Review of changes to the PD (rev 2)	1.25
2/6/15	Matt Freedman	GP	Review of final decision 15-01-051 and assesment of future implementation activiites	1.50
2/9/15	Matt Freedman	PHASE IV	Review of ALJ ruling setting PHC and communications between parties re: Phase IV scope	0.25
2/11/15	Matt Freedman	GP	Review of ruling in A.14-11-007 addressing CARE GTSR discount, review of email from ALJ McKinney directing parties to read ruling	0.25
2/12/15	Matt Freedman	PHASE IV	Communication with CUE re: coordination for Phase IV	0.25
2/17/15	Matt Freedman	GP	Review of PHC statements, discussion with PG&E re: PHC, discussion with Eric Borden re: TURN participation in PHC	1.75
2/20/15	Matt Freedman	GP	Discussion with Hayley Goodson re: CARE discount, discussion with Eric Borden re: GTSR PHC	0.75
2/23/15	Matt Freedman	PHASE IV	Communications with PG&E, CUE re: Phase IV scheduling proposals	0.25
2/23/15	Matt Freedman	ECR	Review of Joint PG&E-Davis statement, communication with PG&E re: Davis issues	0.25
2/24/15	Matt Freedman	EH	Review of PHC transcript	0.75
2/24/15	Matt Freedman	GP	Review of SCE, SDG&E, PG&E Als implementing GTSR procurement and EJ census tract requirements	0.50
3/13/15	Matt Freedman	GP	Review of proposed IOU schedule and comments to PG&E	0.50
3/16/15	Matt Freedman	PHASE IV	Review of CUE Phase IV comments, PG&E response, and MCE/PG&E comments	0.75
4/1/15	Matt Freedman	PHASE IV	Review of PG&E/Davis joint statement and various filings re: EJ reservation methodology	0.50
4/15/15	Matt Freedman	GP	Review of ALJ scoping memo for Phase IV	0.25
5/13/15	Matt Freedman	GP	Review of PG&E AL 4638-E, communication with PG&E raising questions about specific issues	0.75
6/10/15	Matt Freedman	GP	Review of ALJ Colbert email re: hearings and ALJ McKinney message to service list re: GTSR CARE discount	0.25
9/8/15	Matt Freedman	IMP	Review of PG&E Solar Choice External Advisory Board meeting Sep. 1 presentation	0.50
10/11/15	Matt Freedman	IMP	Review of PG&E proposed GTSR project selection via RAM 6 (PRG presentation), communication with PG&E re: results	0.50
10/21/15	Matt Freedman	IMP	Review of Advice Letters filed by SCE, PG&E, SDG&E on GTSR program implementation	0.75
10/29/15	Matt Freedman	IMP	Discussion with David Rubin (PG&E) re: PG&E RAM VI selection of GTSR projects and Phase IV issues	0.75
11/6/15	Matt Freedman	PHASE IV	Drafting of Phase IV Track B opening comments	3.00
11/9/15	Matt Freedman	PHASE IV	Drafting of Phase IV Track B opening comments	2.50
12/3/15	Matt Freedman	PHASE IV	Meeting with Recurrent to discuss ECR structure and RAM	1.00
12/8/15	Matt Freedman	PHASE IV	Review of opening comments on Track IV issues filed by other parties, outline of TURN reply comments	2.50
12/9/15	Matt Freedman	PHASE IV	Drafting of Track IVB reply comments	3.50
12/10/15	Matt Freedman	PHASE IV	Review of opening comments on SB 793 and other Track IV issues filed by other parties, outline of TURN reply comments	3.50

A.12-01-008/A.12-04-020/A.14-01-007 - HOURS

Date	Atty	Task	Description	Time Spent
12/11/15	Matt Freedman	PHASE IV	Drafting of TURN reply comments on SB 793 issues	4.00
12/14/15	Matt Freedman	PHASE IV	Review of reply comments on SB 793 issues submitted by other parties	1.50
12/29/15	Matt Freedman	IMP	Review of SCE extension request for GTSR Advance Procurement Deadline, review of RAM results and D.14-11-042	0.50
1/7/16	Matt Freedman	IMP	Review of presentation materials from the January 5th workshop	1.00
2/16/16	Matt Freedman	IMP	Participation in PG&E Solar Choice External Advisory Group	1.50
4/12/16	Matt Freedman	GP	Initial review of Cooke PD	1.00
4/29/16	Matt Freedman	PHASE IV	Review of PD, drafting of TURN opening comments on PD	2.75
5/8/16	Matt Freedman	GP	Review of opening comments on ALJ Cooke PD submitted by other parties	1.50
5/9/16	Matt Freedman	GP	Review of reply comments on ALJ Cooke PD filed by other parties	0.75
5/11/16	Matt Freedman	GP	Review of revised PD	0.25
7/13/16	Matt Freedman	comp	Preparation of compensation request	4.00
7/14/16	Matt Freedman	comp	Preparation of compensation request	5.00
7/15/16	Matt Freedman	comp	Preparation of compensation request	4.00
7/17/16	Matt Freedman	comp	Preparation of compensation request	2.00
Total: Matt Freedman				490.00
Attorney: Marcel Hawiger				
1/21/14	Marcel Hawiger	#	Review and edit Freedman rebuttal testimony	0.50
Total: Marcel Hawiger				0.50
Attorney: Nina Suetake				
6/26/12	Nina Suetake	GP	Read TURN protest and PG&E application	1.00
6/27/12	Nina Suetake	EH	Attend PHC	1.00
7/6/12	Nina Suetake	EH	Review transcript	0.75
7/6/12	Nina Suetake	GP	Draft emails re: PHC and schedule	0.25
7/19/12	Nina Suetake	GP	Read/draft emails re: scheduling workshop	0.25
7/20/12	Nina Suetake	GP	Read PG&E application, TURN protest, PG&E response to protest	1.50
7/24/12	Nina Suetake	GP	Read PG&E application	0.75
8/2/12	Nina Suetake	GP	Read application and testimony	1.00
8/2/12	Nina Suetake	EH	Attend workshop	4.00
8/17/12	Nina Suetake	GP	Review draft common issues list	0.25
8/27/12	Nina Suetake	GP	Review final issues outline	0.25
10/17/12	Nina Suetake	GP	Discuss issues and procedural schedule in preparation for covering proceeding for MF	0.50
10/31/12	Nina Suetake	PG&E/SETT	Call w/ PG&E to discuss revising procedural schedule to allow for settlement discussions	0.25
11/1/12	Nina Suetake	GP	Read scoping memo	0.25
11/1/12	Nina Suetake	PG&E/SETT	Read/Draft emails re: status of hearings and scheduling settlement discussions	0.25
11/2/12	Nina Suetake	GP	Read/draft emails re: joint email to ALJ	0.25
11/2/12	Nina Suetake	PG&E/SETT	Discuss reason behind hearing delay and settlement discussions w/ Sierra Club	0.50
11/6/12	Nina Suetake	PG&E/SETT	Read email and review agenda re: meet and confer	0.25
11/13/12	Nina Suetake	PG&E/SETT	Participate in meet and confer re: workshops and agenda	1.50
12/5/12	Nina Suetake	PG&E/SETT	Review draft joint status report	0.50
Total: Nina Suetake				15.25
Grand Total				573.04

Attachment 3

Expense Detail

A.12-01-008/A.12-04-020/A.14-01-007 EXPENSES

Date	Task	Description	Amount
<u>Activity: \$Copies</u>			
2/16/12	\$Copies	Copies of Protest of The Utility Reform Network for the Commissioner and ALJ	\$1.60
5/24/12	\$Copies	Copies of Protest of The Utility Reform Network for the Commissioner and ALJ	\$2.00
7/24/12	\$Copies	Copies of Notice of Intent to Claim Intervenor Compensation for the Commissioner and ALJ	\$3.60
10/15/12	\$Copies	Copies of Notice of Intent to Claim Intervenor Compensation and, if Requested, ALJ Ruling on Showing of Significant Financial Hardship for the Commissioner and ALJ	\$3.20
10/19/12	\$Copies	Copies of Testimony on PG&E's Green Option Program, Prepared Testimony of John Sugar, JBS Energy, Inc. for the Commissioner and ALJ	\$9.60
4/8/13	\$Copies	Copies of Opening Brief Of TURN sent to ALJ (omitted from being sent to Commissioner Ferron per his request).	\$1.30
4/26/13	\$Copies	Copies for Reply Brief sent to ALJ (omitted from being sent to Commissioner Ferron per his request).	\$1.80
12/20/13	\$Copies	Copies of Reply comments of TURN on revised utility testimony regarding a green tariff shared renewables program sent to ALJ and Commissioner.	\$2.20
1/29/14	\$Copies	Colour Drop Inv. 91242 B&W copies 120 @ .11 each, staple 20 @ .05 each = \$14.20 + tax 1.24 = \$15.44	\$15.44
2/4/14	\$Copies	Colour Drop Inv. 91265; B&W copies 360 @ .11 each = \$39.60 plus tax 3.47 = \$43.07	\$43.07
2/20/14	\$Copies	Copies of Protest of TURN and The Coalition of Utility Employees sent to ALJ and Commissioner.	\$1.80
3/21/14	\$Copies	Copies of Opening Brief of TURN sent to ALJ and Commissioner.	\$6.20
4/9/14	\$Copies	Copies of Reply Brief Of TURN sent to ALJ.	\$3.40
4/14/14	\$Copies	Copies of NOI sent to ALJ.	\$0.80
5/2/14	\$Copies	Copies of Opening Brief of TURN On Application Of Southern California Edison For Approval of A Green Tariff Shared Renewables Programs sent to ALJ.	\$3.00
5/5/14	\$Copies	Copies of Opening Brief of TURN On Enhanced Community Renewables Proposal of PG&E sent to ALJ.	\$1.10
5/6/14	\$Copies	Colour Drop Inv. 10981 B&W copies 15 sets, 345 copies total (.11 cents per copy) = 37.95 plus tax (3.32) for total: \$41.27	\$41.27
5/9/14	\$Copies	Copies of Reply Brief of TURN On Enhanced Community Renewables Proposal sent to ALJ.	\$0.90
5/9/14	\$Copies	Copies of Reply Brief Of TURN On the Application of Southern California Edison For Approval of A Green Tariff Shared Renewables Program sent to ALJ.	\$1.90
5/23/14	\$Copies	TURN Office Copies & Scans associated with A.14-01-007 for the period March 24, 2014 to May 23, 2014 (total copies: 90)	\$9.00
9/25/14	\$Copies	Copies of Exhibits, request and sent to ALJ Jeanne McKinney	\$6.20
10/7/14	\$Copies	TURN Office Copies & Scans associated with A.12-04-020 for the period August 29, 2014 to October 8, 2014 (8 copies)	\$0.80
12/18/14	\$Copies	Copy of Opening Brief sent to ALJ Jeanne McKinney	\$0.60
1/20/15	\$Copies	Copy Of Opening Comments Of TURN On The Proposed Decision Of ALJ McKinney To Mail To ALJ	\$1.80
11/9/15	\$Copies	Copy of Opening Comments of TURN on the Phase IV Track B Issues to send to the ALJ - 10 pages at \$0.10 per page	\$1.00
11/20/15	\$Copies	Copy of Opening Comments Of TURN on Senate Bill 793 and the Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool to send to ALJ - 7 pages at \$0.10 per page	\$0.70
12/9/15	\$Copies	Copy of Reply Comments of TURN on the Phase IV Track B Issues to Send to the ALJ - 7 pages at \$0.10 per page	\$0.70
12/11/15	\$Copies	Copy of Reply Comments Of TURN On Senate Bill 793 and the Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool to send to the ALJ - 7 pages at \$0.10 per page	\$0.70
Total: \$Copies			\$165.68

A.12-01-008/A.12-04-020/A.14-01-007 EXPENSES

Date	Task	Description	Amount
<u>Activity: \$Postage</u>			
2/16/12	\$Postage	Postage to mail copies of Protest of The Utility Reform Network to the Commissioner and ALJ	\$1.80
5/24/12	\$Postage	Postage to mail copies of Protest of The Utility Reform Network to the Commissioner and ALJ	\$2.20
7/24/12	\$Postage	Postage to mail copies of Notice of Intent to Claim Intervenor Compensation to the Commissioner and ALJ	\$2.20
10/15/12	\$Postage	Postage to mail copies of Notice of Intent to Claim Intervenor Compensation and, if Requested (and X checked), ALJ Ruling on Showing of Significant Financial Hardship to the Commissioner and ALJ	\$2.20
10/19/12	\$Postage	Postage to mail copies of Testimony on PG&E's Green Option Program, Prepared Testimony of John Sugar, JBS Energy, Inc. to the Commissioner and ALJ	\$2.60
4/8/13	\$Postage	Postage of Opening Brief Of TURN sent to ALJ (omitted from being sent to Commissioner Ferron per his request).	\$1.12
4/26/13	\$Postage	Postage for Reply Brief sent to ALJ (omitted from being sent to Commissioner Ferron per his request).	\$1.12
12/20/13	\$Postage	Postage for Reply comments of TURN on revised utility testimony regarding a green tariff shared renewables program sent to ALJ and Commissioner.	\$2.24
2/20/14	\$Postage	Postage for Protest of TURN and The Coalition of Utility Employees sent to ALJ and Commissioner.	\$2.38
3/21/14	\$Postage	Postage for Opening Brief of TURN sent to ALJ and Commissioner.	\$3.22
4/9/14	\$Postage	Postage for Reply Brief Of TURN sent to ALJ.	\$1.61
4/14/14	\$Postage	Postage for NOI sent to ALJ.	\$1.19
5/2/14	\$Postage	Postage for Opening Brief of TURN On Application Of Southern California Edison For Approval of A Green Tariff Shared Renewables Programs sent to ALJ.	\$1.19
5/5/14	\$Postage	Postage for Opening Brief of TURN On Enhanced Community Renewables Proposal of PG&E sent to ALJ.	\$0.00
5/9/14	\$Postage	Postage for Reply Brief Of TURN On the Application of Southern California Edison For Approval of A Green Tariff Shared Renewables Program sent to ALJ.	\$1.40
5/9/14	\$Postage	Postage for Reply Brief of TURN On Enhanced Community Renewables Proposal sent to ALJ.	\$1.19
12/18/14	\$Postage	Postage for Copy of Opening Brief sent to ALJ Jeanne McKinney	\$1.19
1/20/15	\$Postage	Postage To Mail Opening Comments To ALJ	\$2.38
4/27/15	\$Postage	Postage To Mail Prepared Testimony Of Hayley Goodson, Cynthia Mitchell, And Matthew Freedman To ALJ And Commissioner	\$4.90
11/9/15	\$Postage	Postage to mail Opening Comments of TURN on the Phase IV Track B Issues to the ALJ	\$1.20
11/20/15	\$Postage	Postage to Mail Opening Comments Of TURN on Senate Bill 793 and the Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool to the ALJ	\$1.20
12/9/15	\$Postage	Postage to mail Reply Comments of TURN on the Phase IV Track B Issues to the ALJ	\$1.20
12/11/15	\$Postage	Postage to mail Reply Comments Of TURN On Senate Bill 793 and the Renewables Auction Mechanism as an Enhanced Community Renewables Procurement Tool to the ALJ	\$1.20
Total: \$Postage			\$40.93
Grand Total			\$206.61

Attachment 4

TURN Hours Allocated by Issue

A.12-01-008/A.12-04-020/A.14-01-007
ATTORNEYS AND CONSULTANTS

A.12-01-008/A.12-04-020/A.14-01-007 ATTORNEYS AND CONSULTANTS														Total Substantive Hours (not including comp)	Total Compensation (non-travel, non-comp)	
	Billing Period	Hourly Rate	Comp	GP	EH	PROCURE	ECR	PROGDES	PG&E/SETT	RATE	COMP IMPACTS	PHASE IV	IMP			
Matthew Freedman	2012	\$375.00	1.75	10.75	5.00	8.56		2.75	8.75	3.44					39.25	\$14,718.75
	2013	\$400.00		6.00	14.25	19.00	2.50	9.00	98.00	12.25	8.00				169.00	\$67,600.00
	2014	\$410.00	1.00	16.75	55.25	53.65	34.53	13.00	2.25	28.33	7.00				210.75	\$86,407.50
	2015	\$410.00		9.25	0.75	3.10	0.64	1.55		1.94	0.78	23.50	3.00		44.50	\$18,245.00
	2016	\$415.00	15.00	3.50								2.75	2.50		8.75	\$3,631.25
Hayley Goodson	2014	\$355.00			3.00										3.00	\$1,065.00
Eric Borden	2015	\$180.00		2.75	1.50										4.25	\$765.00
Nina Suetake	2012	\$315.00		6.25	5.75				3.25						15.25	\$4,803.75
Marcel Hawiger	2014	\$410.00				0.20	0.03	0.10		0.13	0.05				0.50	\$205.00
John Sugar	2012	\$205.00		0.41	4.08	36.10	1.69	6.75		8.44					57.47	\$11,781.35
	2013	\$210.00							2.57						2.57	\$539.70
TOTAL			17.75	55.66	89.58	120.61	39.38	33.15	114.82	54.52	15.83	26.25	5.50		555.29	\$ 209,762.30